

JESSE LASLOVICH  
United States Attorney  
MADISON L. MATTIOLI  
MT Bar No. 36411284  
ABBIE J.N. CZIOK  
MT Bar No. 55781377  
Assistant U.S. Attorneys  
U.S. Attorney's Office  
901 Front Street, Suite 1100  
Helena, MT 59626  
Phone: (406) 457-5269 – Madison  
(406) 457-5268 – Abbie  
Fax: (406) 457-5130  
Email: madison.mattioli@usdoj.gov  
abbie.cziok@usdoj.gov

Attorneys for Federal Defendants and  
Defendant United States of America.

MARK STEGER SMITH  
MT Bar No. 4160  
TIMOTHY A. TATARKA  
CA Bar No. 277219  
Assistant U.S. Attorneys  
U.S. Attorney's Office  
James F. Battin Federal Courthouse  
2601 2nd Ave. North, Suite 3200  
Billings, MT 59101  
Phone: (406) 247-4667 – Mark  
(406) 247-4642 – Tim  
Fax: (406) 657-6058  
Email: mark.smith3@usdoj.gov  
timothy.tatarka@usdoj.gov

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CALIFORNIA COALITION FOR WOMEN  
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;  
G.M.; A.S.; and L.T., individuals on behalf of  
themselves and all others similarly situated,

Plaintiffs

v.

UNITED STATES OF AMERICA FEDERAL  
BUREAU OF PRISONS, a governmental entity;  
BUREAU OF PRISONS DIRECTOR  
COLETTE PETERS, in her official capacity;  
FCI DUBLIN WARDEN THAHESHA JUSINO,  
in her official capacity; OFFICER  
BELLHOUSE, in his individual capacity;  
OFFICER GACAD, in his individual capacity;  
OFFICER JONES, in his individual capacity;  
LIEUTENANT JONES, in her individual  
capacity; OFFICER LEWIS, in his individual  
capacity; OFFICER NUNLEY, in his individual  
capacity; OFFICER POOL, in his individual  
capacity; LIEUTENANT PUTNAM, in his  
individual capacity; OFFICER SERRANO, in  
his individual capacity; OFFICER SHIRLEY, in  
his individual capacity; OFFICER SMITH, in his  
individual capacity; and OFFICER VASQUEZ,  
in her individual capacity,

Defendants.

CASE NO. 4:23-CV-04155-YGR

**DECLARATION OF MADISON MATTIOLI**

I, Madison Mattioli, declare as follows:

DECLARATION OF MATTIOLI  
ISO ADMIN. MOTION TO FILE UNDER SEAL  
4:23-cv-04155-YGR

- 1 1. My name is Madison Mattioli, and I am an attorney of record in the above captioned case
- 2 representing Federal Defendants and Defendant United States of America.
- 3 2. Opposing counsel was not contacted prior to filing this motion, as we are requesting that excerpts
- 4 of the Brief in Support of the Rule 60 motion and the entirety of the Nancy McKinney
- 5 declaration that are filed under seal be reviewed *in camera*.
- 6 3. Federal Defendants and Defendant United States of America cannot disclose to Plaintiffs the
- 7 contents of the excerpt and document filed under seal to seek their position, as the documents
- 8 contain highly sensitive information, the disclosure of which would be detrimental to institution
- 9 operations and security.
- 10 4. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and
- 11 correct.

12 Executed this 16th day of April, 2024, at Helena, MT.

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15 /s/ Madison L. Mattioli  
16 MADISON L. MATTIOLI  
17 Assistant United States Attorney  
18 District of Montana  
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